

1 WRIGHT, FINLAY & ZAK, LLP
2 Ramir M. Hernandez, Esq.
3 Nevada Bar No. 13146
4 7785 W. Sahara Ave., Suite 200
5 Las Vegas, NV 89117
6 (702) 475-7964; Fax: (702) 946-1345
7 rhernandez@wrightlegal.net

8 *Attorneys for Defendants, Conn Appliances, Inc. and 2233 Paradise Road, LLC dba Cash*
9 *Factory USA*

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 JESUS GONZALEZ,

13 Plaintiff,

14 vs.

15 CLARITY SERVICES, INC.; EQUIFAX
16 INFORMATION SERVICES, LLC;
17 EXPERIAN INFORMATION SOLUTIONS,
18 INC.; NATIONAL CONSUMER TELECOM
19 & UTILITIES EXCHANGE; TRANS UNION,
20 LLC; PLAIN GREEN, LLC; 2233 PARADISE
21 ROAD, LLC dba CASH FACTORY USA;
22 CONN APPLIANCES, INC.; GREAT
23 AMERICAN FINANCE HOLDINGS, LLC;
24 AT&T MOBILITY, LLC; COX
25 COMMUNICATIONS LAS VEGAS, INC.; and
26 BACKGROUNDCHECKS.COM, LLC,

27 Defendants.

Case No.: 2:21-CV-01068-APG-BNW

**JOINT MOTION TO EXTEND
DEADLINE TO RESPOND TO
PLAINTIFF'S COMPLAINT (SECOND
REQUEST)**

28 Plaintiff, Jesus Gonzalez ("Plaintiff"), and Defendant, 2233 Paradise Road, LLC dba Cash
Factory USA ("Cash Factory USA") (collectively "Parties"), by and through their counsel of
record, hereby move as follows:

On June 7, 2021, Plaintiff filed his Complaint [ECF No. 1]. Cash Factory USA was served
with Plaintiff's Complaint on July 16, 2021. The original deadline for Cash Factory USA to
respond to Plaintiff's Complaint was August 9, 2021. On August 9, 2021, the Court granted Cash
Factory USA's Joint Stipulation for Extension of Time for Defendant to file Answer, which set

September 8, 2021, as the new deadline [ECF No. 22]. Plaintiff then filed an Amended Complaint on August 12, 2021. [ECF No. 25]. The Parties have discussed extending the deadline for Cash Factory USA to respond to Plaintiff's Amended Complaint to allow for better investigation of the allegations and discuss possible resolution of the matter.

WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Cash Factory USA to file their responsive pleading to Plaintiff's Amended Complaint to September 22, 2021.

This is the second motion for an extension of time for Cash Factory USA to file their responsive pleading. The parties are actively discussing settlement. In the event the parties cannot resolve the case, it is anticipated that they will stipulate to remove the case to arbitration. The extension is requested in good faith and is not for purposes of delay or prejudice to any other party.

As part of this motion, Cash Factory USA agrees to participate in any Rule 26(f) conference that occurs during the pendency of this extension.

DATED this 13th day of September, 2021.

WRIGHT, FINLAY & ZAK, LLP

KIND LAW

/s/ Ramir M. Hernandez

/s/ Michael Kind

Ramir M. Hernandez, Esq.

Michael Kind, Esq.

Nevada Bar No. 13146

Nevada Bar No. 13903

7785 W. Sahara Ave., Suite 200

8860 S. Maryland Pkwy, Suite 106

Las Vegas, NV 89117

Las Vegas, NV 89123

Attorneys for Defendants, Conn Appliances, Inc. and 2233 Paradise Road, LLC dba Cash Factory USA

Attorneys for Plaintiff, Jesus Gonzalez

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: September 14, 2021